

IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF ALABAMA
SOUTHERN DIVISION

DION ROBINSON

PLAINTIFF,

VS.

DON PARKER

DEFENDANT.

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CASE NO.:

A TRIAL BY JURY
IS REQUESTED

COMPLAINT

I. INTRODUCTION

1. This is an action for money damages instituted to secure the protection of and to redress the deprivation of rights secured through the Civil Rights Act of 1866, as amended by Section 101 of the Civil Rights Act of 1991, and codified as 42 U.S.C. Section 1981, which provides for relief from racial discrimination in employment.

II. JURISDICTION

2. Jurisdiction of this Court is invoked pursuant to 28 U.S.C. Sections 1331, 1343(4); 28 U.S.C. Sections 2201 and 2202.

3. The unlawful employment practices alleged herein below were committed by the Defendant within Dale County, Alabama. Venue is proper under 28 U.S.C. Section 1391(b).

III. STATEMENT OF ALLEGATIONS

4. Plaintiff avers that the Defendant while serving as Mayor of the Town of Midland City, Alabama constructively terminated plaintiff's employment as a police officer because of Plaintiff's race (Black);

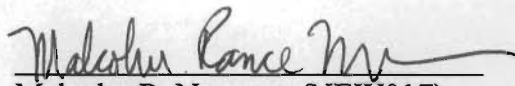
5. That the Defendant acted against Plaintiff because Defendant objected to Plaintiff's personal relationship with a white female also employed by the town of Midland City;

6. That Defendant's conduct denied Plaintiff of the rights and benefits to which he was entitled as a citizen.

IV. CLAIMS FOR RELIEF

7. Plaintiff claims of the Defendant an amount of money as compensation for the psychological and emotional pain and suffering his actions caused, in an amount to be determined by the jury but no less than \$250,000.00 plus fees and costs.

Malcolm R. Newman, Attorney, P.C.



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